# **Executive Summary**

### AP-05 Executive Summary - 91.200(c), 91.220(b)

#### 1. Introduction

The City of Charlotte and Charlotte-Mecklenburg Regional Housing Consortium's Annual Action Plan identifies the City's community development needs and outlines a comprehensive and coordinated strategy for addressing these needs. It serves as the application for funding for the following federal entitlement programs that serve low and moderate income families;

- Community Development Block Grant (CDBG)
- HOME Investment Partnership (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for Persons with HIV/AIDS (HOPWA)

#### Overview

The City of Charlotte along with the nation has experienced the most turbulent year in recent memory. 2020 was marked by a worldwide pandemic and increased strain on the housing market due to growing demand and supply side constraints worsened by pandemic response measures. The result is historically low housing unit availability in both the rental and for sale market. At the same time the City is experiencing the highest unemployment rates since the great recession.

Unlike the 2008 recession, this crisis is disproportionately impacting lower income renters. Charlotte immediately responded with rent, utility and mortgage payment assistance along with supporting City homeless service providers. This response continues. The growing cost of housing continues to increase the number of housing cost burden Households, especially at incomes below 80% area median income. Households at this income level struggle to find decent, affordable housing and high housing costs crowds out spending on daily living expenses such as food and transportation.

The City of Charlotte will continue to bring both federal and local resources to increase affordable housing and economic opportunity. City leaders share a vision with the community of an increasingly equitable city that offers a range of housing options in areas of high opportunity. At the same time, the City will continue to provide resources to protect and support Charlotte's most vulnerable populations.

#### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The City of Charlotte's plan builds off the successes of past plans and identifies seven goals for the year's activities:

Provide opportunities for homeownership

- 1. Improve existing housing stock
- 2. Increase neighborhood sustainability
- 3. Provide temporary rental assistance
- 4. Provide programs to support persons with HIV/AIDS
- 5. Provide Assistance to households in crisis
- 6. Increase the supply of affordable rental housing

Some goals will be accomplished through continued funding of the City's housing rehabilitation programs and the HouseCharlotte downpayment assistance program. Other goals will be accomplished by partnering with community agencies to rehabilitate and develop housing, provide emergency utility / rental assistance and support programs that assist families return to self-sufficiency. Ending and preventing homelessness continues to be a particular focus for the Charlotte community and this plan. To assist in reaching this goal, the City will continue to provide support for homeless services agencies through funding of shelter operations, homelessness prevention and the provision of rental subsidies. Approval of the Action Plan is a requirement for continued participation in federally funded housing and community development programs. The activities indicated in this plan address three statutory goals set by HUD:

Provide Decent Housing
Provide A Suitable Living Environments
Provide Expanded Economic Opportunities

#### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

From 2015 to 2020 the City of Charlotte used HUD funding in varied ways to improve the lives of low and moderate income households in Charlotte. The City of Charlotte provided over 950 rehabilitated housing units, funded over 5,000 units of new construction, approved approximately 1,400 loans for downpayment assistance and funded agencies providing housing counseling, emergency assistance

Annual Action Plan

payments, rental assistance and emergency housing services. It also continued support for the ongoing redevelopment of Brightwalk, a mixed income housing community. The City provided job creating economic development loans and supported programs that provide educational enrichment activities for children. As the City of Charlotte grows, the need for these activities continues and services such as these play an important role in creating diverse, healthy and vibrant communities for all Charlotteans.

#### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City of Charlotte is committed to ensuring all Charlotte-Mecklenburg residents have the opportunity to learn, understand and provide comments regarding City plans. While developing the plan, the City consults with its housing and community development partners. These groups included nonprofit organizations, Carolina's Care Partnership, the Continuum of Care and Inlivian (formerly the Charlotte Housing Authority).

Based on partner feedback, a needs assessment, and market analysis, the City developed a draft plan that was presented at two community forums, one of which was provided in Spanish. The draft plan was made available for 30 days for review and comment online. Finally, City Council held a public hearing prior to approving the plan. This City conducts citizen engagement that results in better plans that more wholly reflect the needs and aspirations of all Charlotteans.

#### 5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

While no formal comments were submitted, comments from the community during meetings and the public hearing were in support for affordable housing development. Citizens expressed various housing needs including affordable rental units, housing subsidies and housing repair needs.

#### 6. Summary of comments or views not accepted and the reasons for not accepting them

N/A

#### 7. Summary

The City of Charlotte, its elected officials and community development practitioners work with diligence to provide all Charlotteans with safe communities and neighborhoods that are healthy and vibrant. The FY2022 Action Plan provides programs and resources to achieve these goals. The plan emphasizes the

City's role as a partner in a larger coalition of agencies providing diverse housing and services to the citizens of Charlotte Mecklenburg.						

## PR-05 Lead & Responsible Agencies - 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency		
CDBG Administrator	Charlotte	Housing & Neighborhood Services		
HOPWA Administrator	Charlotte	Housing & Neighborhood Services		
HOME Administrator	Charlotte	Housing & Neighborhood Services		
ESG Administrator	Charlotte	Housing & Neighborhood Services		

Table 1 - Responsible Agencies

#### **Narrative**

#### **Consolidated Plan Public Contact Information**

Warren Wooten
Housing & Neighborhod Services
600 E. Trade Street
Charlotte, NC 28202
704-336-2489
warren.wooten@charlottenc.gov

### AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

#### 1. Introduction

The following section outlines the City's consultation process. By consulting and collaborating with housing and community development stakeholders, the City can align and coordinate community development programs with a range of other plans, programs and resources to achieve greater impact.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The City of Charlotte recognizes the need for a coordinated effort between local governments, nonprofits and provider agencies in dealing with the challenges facing low and moderate income families. To foster coordination, the City serves on the Charlotte-Mecklenburg Continuum of Care (CoC) board which works to coordinate and provide additional funding for homeless services. The City also participates on the A Way Home Advisory board, a public private partnership providing locally funded housing vouchers. The City also holds quarterly meetings with Consortia members and nonprofit housing organizations to develop housing projects that serve the Charlotte Mecklenburg region.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City continues to address the need of homeless persons and persons at risk of homelessness through involvement with the CoC. The City consults with CoC participants to determine the funding priorities for ESG and HOME TBRA. The ESG program follows CoC coordinated entry and prioritization guidelines. This group encompasses broad community representation including individuals with lived experience.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City works directly with the Charlotte-Mecklenburg Continuum of Care (CoC) during the planning and allocation of ESG funds. Prior to the release of the funding application, the CoC provides information on service gaps to assist with establishing priorities. To assist with project evaluation, the CoC provides the City PIT/HIC data, data from HMIS/DV comparable database, compliance with written standards and prioritization and implementation concerns. The City actively participates in the Continuum of Care board which develops the policies and procedures for the operation and administration of HMIS.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	CHARLOTTE HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Assists in authoring the action plan.
2	Agency/Group/Organization	Carolina's Care Partnership
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted.  What are the anticipated outcomes of the consultation or areas for improved coordination?	CCP provides valuable data and program targeting information as the City's HOPWA program sponsor.
3	Agency/Group/Organization	Charlotte Mecklenburg Housing Partnership
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CMHP is a major City partners and works closely with City staff on program development and implementation.
4	Agency/Group/Organization	Charlotte-Mecklenburg Continuum of Care
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services - Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City actively participates on this board and provides regular updates on city programs. The City ESG program follows guidelines outlined by the CoC.
5	Agency/Group/Organization	Community Relations Committee
	Agency/Group/Organization Type	Business Leaders Civic Leaders

What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
Briefly describe how the Agency/Group/Organization was consulted.	The City presents Action Plan information to the CRC board
What are the anticipated outcomes of the consultation or areas for	each year.
improved coordination?	

Identify any Agency Types not consulted and provide rationale for not consulting

## Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Cara	Mecklenburg County	The CoC and Action plan utilize the same coordinated entry and prioritization processes
Continuum of Care		to ensure equitable program delivery.

Table 3 – Other local / regional / federal planning efforts

### **Narrative**

# AP-12 Participation - 91.401, 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

## **Citizen Participation Outreach**

Sort Or der	Mode of Out reach	Target of Out reach	Summary of response/atte ndance	Summary of comments re ceived	Summary of co mments not accepted and reasons	URL (If applica ble)
		Non-				
1	Newspaper	targeted/bro				
-	Ad	ad				
		community				
	Newspaper Ad	Non-English				
		Speaking -				
2		Specify other				
		language:				
		Spanish				
		Non-				
3	Public	targeted/bro				
3	Meeting	ad				
		community				

**Table 4 – Citizen Participation Outreach** 

# **Expected Resources**

# AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

Funding resources include annual formula allocations from HUD, program income generated by payments made on investments and remaining resources from prior years.

## **Anticipated Resources**

Program	Source of	Uses of Funds	Ехр	ected Amoun	t Available Yea	Expected	Narrative	
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	Description
CDBG	public -	Acquisition						
	federal	Admin and Planning						
		Economic Development						
		Housing						
		Public Improvements						
		Public Services	5,866,405	300,000	0	6,166,405	0	

Program	Source of	Uses of Funds	Exp	ected Amoun	ar 1	Expected	Narrative	
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	Description
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	3,191,443	600,000	0	3,791,443	0	
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	3,029,512	0	0	3,029,512	0	

Program	Source of	Uses of Funds	Ехр	ected Amoun	ır 1	Expected	Narrative	
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	Description
ESG	public -	Conversion and rehab for						
	federal	transitional housing						
		Financial Assistance						
		Overnight shelter						
		Rapid re-housing (rental						
		assistance)						
		Rental Assistance						
		Services						
		Transitional housing	509,569	0	0	509,569	0	

**Table 2 - Expected Resources - Priority Table** 

# Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City of Charlotte uses federal and local funding together to support a wide range of housing and community development activities. The City uses local dollars earmarked for housing and leverages dollars provided by City partners to provide an outstanding return on federal investments. Typically, the City sets aside local dollars to match with HOME funds, only drawing 75% of a project cost and the remaining amount from local funds on each HOME draw. In response to financial conditions during the public health emergency, the city has been granted a waiver from providing local dollars for a portion of FY 2021 and FY 2022. The Emergency Solutions Grant match is provided by each subrecipient and verified during yearly grant monitoring.

# If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Charlotte is reviewing current public land assets for possible use in providing affordable housing solutions. Several sites related to the development of the light rail transit are now in use as affordable housing locations.

#### Discussion

Charlotte continues to leverage HUD funding by utilzing local partners, pairing HUD dollars with other funding opportunities and investing in housing and community services.

# **Annual Goals and Objectives**

# AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

# **Goals Summary Information**

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
1	Provide opportunities	2020	2024	Affordable	City of Charlotte	Increase	HOME:	Homeowner Housing
	for homeownership			Housing	City of	homeownership	\$2,132,499	Added: 325 Household
					Charlotte/	opportunities		Housing Unit
					Mecklenburg	Strengthen		
					County	neighborhoods and		
						key corridors		
2	Improve existing	2020	2024	Affordable	City of Charlotte	Strengthen	CDBG:	Rental units rehabilitated:
	affordable housing			Housing	City of	neighborhoods and	\$3,328,074	50 Household Housing Unit
	stock				Charlotte/	key corridors	HOME:	Homeowner Housing
					Mecklenburg	Increase and	\$592,786	Rehabilitated: 125
					County	preserve rental		Household Housing Unit
						housing		
						Protect existing		
						affordable housing		

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Increase	2020	2024	Affordable	City of Charlotte	Strengthen	CDBG:	Public service activities
	neighborhood			Housing	City of	neighborhoods and	\$2,838,331	other than Low/Moderate
	sustainability			Non-Housing	Charlotte/	key corridors	HOME:	Income Housing Benefit:
	,			Community	Mecklenburg		\$386,158	650 Persons Assisted
				Development	County			Rental units constructed:
								25 Household Housing Unit
								Rental units rehabilitated:
								75 Household Housing Unit
								Homeowner Housing
								Rehabilitated: 50
								Household Housing Unit
								Other: 40 Other
4	Provide temporary	2020	2024		City of Charlotte	Support special	HOME:	Tenant-based rental
	rental assistance					populations	\$430,000	assistance / Rapid
								Rehousing: 50 Households
								Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Provide programs to	2020	2024	Affordable	HOPWA	Support special	HOPWA:	Public service activities
	support persons with			Housing	Designated	populations	\$3,029,512	other than Low/Moderate
	HIV/AIDS			Homeless	Service Area			Income Housing Benefit:
				Non-Homeless				100 Persons Assisted
				Special Needs				Tenant-based rental
								assistance / Rapid
								Rehousing: 100 Households
								Assisted
								Homelessness Prevention:
								15 Persons Assisted
								HIV/AIDS Housing
								Operations: 300 Household
								Housing Unit
6	Provide assistance to	2020	2024	Affordable	City of Charlotte	Support special	ESG:	Tenant-based rental
	households in crisis			Housing		populations	\$509,569	assistance / Rapid
				Homeless		Mitigate effects of		Rehousing: 200 Households
						COVID Pandemic		Assisted
								Homeless Person Overnight
								Shelter: 2500 Persons
								Assisted
								Homelessness Prevention:
								200 Persons Assisted
7	Increase the supply	2020	2024	Affordable	City of Charlotte	Increase and	HOME:	Rental units constructed: 8
	of affordable rental			Housing		preserve rental	\$250,000	Household Housing Unit
	housing					housing		

Table 3 – Goals Summary

# **Goal Descriptions**

1	Goal Name	Provide opportunities for homeownership
	<b>Goal Description</b>	
2	Goal Name	Improve existing affordable housing stock
	Goal Description	
3	Goal Name	Increase neighborhood sustainability
	<b>Goal Description</b>	
4	Goal Name	Provide temporary rental assistance
	<b>Goal Description</b>	
5	Goal Name	Provide programs to support persons with HIV/AIDS
	Goal Description	
6	Goal Name	Provide assistance to households in crisis
	Goal Description	
7	Goal Name	Increase the supply of affordable rental housing
	Goal Description	

### AP-35 Projects - 91.420, 91.220(d)

#### Introduction

The City of Charlotte will continue to implement City Council priorities as described in the action plan. For the FY22 fiscal year, the City will provide housing rehabilitation, new construction, rental subsidies, downpayment assistance, relocation, funding for HIV related housing initatives, emergency shelter, housing support and funding for the Safe Charlotte initiative.

#	Project Name
1	FY22 Housing Rehabilitation
2	FY22 HOPWA Funded Projects
3	FY22 ESG Projects
4	FY22 New Construction, Consortia & Nonprofit Projects
5	FY22 TBRA
6	FY22 HouseCharlotte & Financial Assistance
7	FY22 Optional Relocation
8	FY22 SAFE Charlotte

Table 4 – Project Information

# Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Allocation priorities were made based on City Council priorities, community comments and ongoing project needs. The resources available to support creating and perserving affordable housing units continue to be insufficient to meet existing demand for affordable rental units resulting in high levels of cost burdened households within the City and the increasing costs of real estate.

# **AP-38 Project Summary**

**Project Summary Information** 

1	Project Name	FY22 Housing Rehabilitation
	Target Area	City of Charlotte
	Goals Supported	Improve existing affordable housing stock Increase neighborhood sustainability
	Needs Addressed	Strengthen neighborhoods and key corridors Increase and preserve rental housing Protect existing affordable housing
	Funding	CDBG: \$3,138,114 HOME: \$592,786
	Description	Provide housing rehabilitation services for single and multifamily housing units providing no less than 51% LMI benefit.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 175 households will benefit from rehabilitation activities.
	<b>Location Description</b>	These services will be provided throughout the City of Charlotte.
	Planned Activities	The City provides housing rehabilitation services throughout the City of Charlotte.
2	Project Name	FY22 HOPWA Funded Projects
	Target Area	City of Charlotte HOPWA Designated Service Area
	Goals Supported	Provide programs to support persons with HIV/AIDS
	Needs Addressed	Support special populations
	Funding	HOPWA: \$3,029,512
	Description	This project provides programs and services to support households with HIV/AIDS. These activities may include the supportive services, housing information services, acquisition, renovation and operating of housing facilities.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Over 500 households will benefit from HOPWA services.

	Location Description	<div>Charlotte's HOPWA program serves a HOPWA service are that includes Mecklenburg, Union, Cabarrus, Gaston, Iredell, and Rowan Counties in NC and Chester, York, and Lancaster Counties in SC.</div>
	Planned Activities	Charlotte partners with nonprofits throughout the servicea area and issues an RFP for services. Local nonprofits determine the services needed in their communities. All services allowed under the HOPWA program are provided by one or more service provider in the service area.
3	Project Name	FY22 ESG Projects
	Target Area	City of Charlotte
	Goals Supported	Provide assistance to households in crisis
	Needs Addressed	Support special populations Mitigate effects of COVID Pandemic
	Funding	ESG: \$509,569
	Description	This project includes a broad range of programs and services that support homeless and at risk of homelessness individuals and families.
<b>Target Date</b> 6/30/2022		6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Over 2,900 persons benefit from ESG funded programs and facilities.
	<b>Location Description</b>	Throughout the City of Charlotte.
	Planned Activities	ESG funding supports rapid rehousing, emergency shelter, homelessness prevention, HMIS utilization and street outreach activities.
4	Project Name	FY22 New Construction, Consortia & Nonprofit Projects
	Target Area	City of Charlotte City of Charlotte/ Mecklenburg County
	Goals Supported	Provide opportunities for homeownership Improve existing affordable housing stock Increase neighborhood sustainability
	Needs Addressed	Increase homeownership opportunities Strengthen neighborhoods and key corridors Increase and preserve rental housing Assist households secure and maintain housing Sustain community facilities and infastructure

	Funding	CDBG: \$1,748,331 HOME: \$636,158
	Description	This project includes the housing activities and non-housing activities of nonprofit partners, affordable housing developers and consortia members. City partners use this funding for new construction, down payment assistance, housing rehabilitation, acquisition, public facilities, public services and infrastructure projects that improve the quality and resiliency of neighborhoods.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Over 400 households will benefit from this activity.
	Location Description	Activities are provided by partners throughout Mecklenburg County.
	Planned Activities	The City of Charlotte partners with a diverse group of nonprofit partners to provide housing projects, programs and facilities that streighten neighborhoods. The City releases an RFP each year to fund a wide array of housing activities each year. It also partners with Dream Key Partners, the area's largest housing nonprofit, to provide a variety of new housing and rehabilitated housing units.
5	Project Name	FY22 TBRA
	Target Area	City of Charlotte
	Goals Supported	Provide temporary rental assistance
	Needs Addressed	Assist households secure and maintain housing
	Funding	HOME: \$430,000
	Description	The projects supports contracts with nonprofit partners who provide rental assistance to LMI households.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Appoximately 50 households will benefit from tenant based rental assistance.
	Location Description	Various locations throughout the City of Charlotte.
	Planned Activities	HOME funded Tenant Based Rental Assistance.
6	Project Name	FY22 HouseCharlotte & Financial Assistance

	Target Area	City of Charlotte
	Goals Supported	Provide opportunities for homeownership
	Needs Addressed	Increase homeownership opportunities
	Funding	HOME: \$2,132,499
	Description	This project consists of deferred forgivable loans and grants. Funding is provided to low and moderate income households to assist in the purchase and financing of single family homes to support homeownership.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The City anticipates making 325 loans to LMI households this year.
	Location Description	Throughout the City of Charlotte.
	Planned Activities	Downpayment assistance.
7	Project Name	FY22 Optional Relocation
	Target Area	City of Charlotte
	Goals Supported	Increase neighborhood sustainability
	Needs Addressed	Strengthen neighborhoods and key corridors
	Funding	CDBG: \$150,000
	Description	Funding for tenant relocation due to property code violations.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 households will benefit from this program.
	Location Description	Throughout the City of Charlotte.
	Planned Activities	This program provides optional relocation assistance to households residing in rental properties with code violations. Renter households are given the option of relocation if the landlord will not make timely repairs.
8	Project Name	FY22 SAFE Charlotte
	Target Area	City of Charlotte
	Goals Supported	Increase neighborhood sustainability

Needs Addressed	Strengthen neighborhoods and key corridors
Funding	CDBG: \$1,129,960
Description	A group of grants to nonprofit organizations that provide public services to increase community safety.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	Approximately 500 households will be assisted.
<b>Location Description</b>	Throughout the City of Charlotte.
Planned Activities	Public services to increase community safety.

### AP-50 Geographic Distribution - 91.420, 91.220(f)

# Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

This City of Charlotte is a rapidly growing community. In the past, lower income communities were located in the West, East and North sides of Uptown while Uptown and South Charlotte were predominately affluent communities. As Charlotte has recovered from the Great Reccession, areas near Uptown have seen significant increases in real estate cost. Areas of town that were once predominiately low income are now mixed.

The City is currently providing special programming into two rapidly changing neighborhoods; Washington Heights and Revolution Park. Additional areas experiencing rapid change may be added to this focused approach.

#### **Geographic Distribution**

Target Area	Percentage of Funds
City of Charlotte	74
City of Charlotte/ Mecklenburg County	5
HOPWA Designated Service Area	21

**Table 5 - Geographic Distribution** 

#### Rationale for the priorities for allocating investments geographically

The City broadly allocates funding throughout the City based on the fund type and its eligable geography. Specific applications of funding are determined on a program level and based on the client served.

#### Discussion

# **Affordable Housing**

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

The City of Charlotte continues to recognize a critical shortage in housing affordable to families at or below 80% of median area income. In addition to the need for new affordable units, development pressures in Charlotte endanger existing affordability of neighborhoods in or near the City's urban core. Both securing new affordable units and preserving existing units are essential components to a comprehensive housing strategy. The City also provides resources to reduce and eliminate homelessness. One resource, temporary rental assistance, is provided through city nonprofit housing partners as a component of a larger homelessness reduction plan.

One Year Goals for the Number of Households to be Supported	
Homeless	2,900
Non-Homeless	500
Special-Needs	329
Total	3,729

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	150
The Production of New Units	325
Rehab of Existing Units	175
Acquisition of Existing Units	0
Total	650

Table 7 - One Year Goals for Affordable Housing by Support Type

#### **Discussion**

The City will provide up to 325 down payment assistance loans, rehabilitate 175 housing units and provide 150 households with rental assistance. The City will also support homeless shelter operations, outreach and HOPWA funded programming that will reach over 300 households.

### AP-60 Public Housing - 91.420, 91.220(h)

#### Introduction

INLIVIAN (formerly the Charlotte Housing Authority) administers nearly 5,000 tenant-based Housing Choice Vouchers (HCVs) and as of January 2021, has provided 5,612 units of housing at 47 developments it either owns or manages. INLIVIAN developments are spread throughout the City of Charlotte but are concentrated nearby Uptown Charlotte. INLIVIAN's HCVs are concentrated in neighborhoods immediately west, north, and east of Uptown Charlotte, with comparatively fewer voucher families in South Charlotte. Promoting affordable, mixed income communities and encouraging HCV clients to move to higher-opportunity neighborhoods—such as those with good schools, low crime, and access to jobs and public transit—has been a key INLIVIAN priority in helping address Charlotte's economic mobility challenges. To that end, the agency has utilized Moving to Work (MTW) flexibility to implement: Exception Payment Standards at the Census tract level to offer higher rent amounts, a local Choice Mobility Program to facilitate moves into high-opportunity neighborhoods, incentives for landlords to participate in the HCV program, and expansion of the local supply of permanent mixed-income units through acquisition, rehabilitation, and development of permanent workforce, market rate, and affordable units in desirable neighborhoods.

In 2020 INLIVIAN employed several administrative waivers and also executed COVID-related technical amendments granted by the US Department of Housing and Urban Development (HUD) to increase administrative efficiencies while responding to economic impacts of the pandamemic. Through the applicable plan period, MTW flexibility will continue to play a vital role in expanding the supply of affordable housing in Charlotte while also adapting key services necessary for families to stabilize from the losses accrued via the COVID-19 pandemic.

#### Actions planned during the next year to address the needs to public housing

Since 2014, INLIVIAN converted much of the agency's public housing developments to the HUD Rental Assistance Demonstration (RAD) program. Over the applicable planning period, INLIVIAN will continue to leverage its MTW status and local partnerships to inform a comprehensive method for preserving and building hard unit options in the City of Charlotte for low-income families. The goal of INLIVIAN's Public Private Partnership (P3) Program is to work in concert with third party developers to increase the number of affordable housing units in the City of Charlotte. INLIVIAN will continue to utilize these new communities to mainstream the agency's RAD vouchers to redevelop obsolete sites, thereby increasing the density and further adding affordable units to the city's shrinking supply. These sites are all located in high opportunity or moderate opportunity areas by definition and are close to job opportunities, transit options, and well performing public schools; this approach too, gives INLIVIAN clients a chance to move into communities not historically known as being federally subsidized, and which are mixed income. All P3 projects are in various stages of construction with completion and lease up anticipated through the applicable planning period and beyond.

CORE, INLIVIAN's Client Services entity, delivers supportive services to residents in gaining the necessary skills for success, intended to increase client families quality of life. CORE's primary goal is to help families become financially stable and decrease their dependence on housing subsidy. Case managers work with families to identify barriers and coordinate resources to address these barriers. As many of INLIVIAN's work-able clients were left unemployed due to the COVID-19 pandemic, these programs and services will be evermore vital through the applicable plan period as households regain their economic footing and re-establish household goals related to employment and wage growth.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

INLIVIAN's Resident Advisory Council (RAC) serves as the leadership advisory body for families who live in the agency's assisted housing communities. The advisory body is comprised of all the presidents from residents' organizations within our portfolio of communities. The Resident Advisory Council continues to encourage residents to participate in all aspects of community life and serve as a liaison to INLIVIAN staff and Commissioners. RAC officers have attended numerous workshops and seminars on leadership and building community-based organizations. The goals of the RAC are:

- To increase the number of resident organizations in INLIVIAN's portfolio of communities
- To increase resident involvement in community activities
- To enhance the organization's relationship with staff and Charlotte Mecklenburg Police Department

To provide homeownership opportunities to INLIVIAN residents, INLIVIAN's Destination Homeownership program offers the Housing Choice Voucher subsidy to obtain homeownership. The program assists voucher holders bridge the gap of affordability in order to make homeownership in Mecklenburg County a reality.INLIVIAN abides by a a dual stream support services program model, as a primary approach to self-sufficiency within INLIVIAN's homeownership program and life coach services. INLIVIAN's Family Self Sufficiency (FSS) program, Moving Forward Program, Parent Child Plus Program, Youth Services Program, and Senior and Disabled Program services assist families in obtaining individualized goals. INLIVIAN provides certified life coaching, case management, financial literacy, employment referrals, and job training opportunities through the agency's Destination Homeownership program.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

NA

### Discussion

# AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i) Introduction

The City of Charlotte, along with its many community partners, continues to focus on homelessness in the Charlotte community. While the most recent Point in Time counts indicates that the Charlotte-Mecklenburg is making progress, homelessness is still a significant community issue and requires the ongoing support of the many programs and agencies working to reduce homelessness.

# Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

# Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

This City will continue to support the use of the local Coordinated Entry process for all persons experiencing homelessness or at risk of homelessness. All persons are assessed for housing, supportive service, and mainstream benefits needs, to ensure all persons have equal access to assistance. The City will also continue to support agencies who conduct street outreach activities to ensure persons that are unsheltered are connected to the Coordinated Entry process and other community resources.

#### Addressing the emergency shelter and transitional housing needs of homeless persons

The City will continue to fund emergency shelters that serve men, women, families, and persons fleeing domestic violence, sex trafficking, dating violence, sexual assault and stalking. Additionally, support will continue for transitional housing programs serving women, families, youth (18-24), LGBTQ+, and Veterans. With the goal of exiting to permanent housing, the city also will continue to provide funding for rapid-rehousing and housing relocation and stabilization services.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City will continue to work to help return homeless persons to permanent housing more quickly by participating in local Coordinated Assessment process and increasing the availability of rental assistance. Maintaining funding for persons at risk of homelessness will remain a focus for the City. The City will also continue to provide financing for below market rate housing units and housing units that provide supportive services. The goal of these efforts is to more quickly provide services for persons experiencing homelessness or at risk of homelessness and ensure adequate quantities of housing stock

affordable to low and moderate income households.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The City will continue to support the local Coordinated Entry process that includes diversion assistance. The City will also continue support for emergency shelters, rapid-rehousing and housing relocation and stabilization services if person are unable to be diverted after being discharged form a publicly funded institution or system of care.

#### Discussion

The City's goal is to continue to provide tools to nonprofit agencies working daily to prevent and end homelessness through ongoing funding of emergency shelters, homelessness prevention services and rapid rehousing programs. The City will continue to actively participate in the Continuum of Care board and its coordinated entry process which is designed to identify and serve individuals and households in need of critical housing assistance to prevent or mitigate homelessness.

# AP-70 HOPWA Goals - 91.420, 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:		
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or		
family	225	
Tenant-based rental assistance	95	
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	9	
Units provided in transitional short-term housing facilities developed, leased, or operated with		
HOPWA funds	0	
Total	329	

# AP-75 Barriers to affordable housing -91.420, 91.220(j) Introduction

Factors creating barriers to affordable housing include stresses on available funding for affordable housing, high land costs, dilapidated housing stock and the lack of low income household access to credit.

The City of Charlotte works proactively to ensure diverse housing is available throughout the City. The City supports housing programs and operates a local Housing Trust Fund to provide gap financing for new housing developments. This resource is becoming increasingly stressed due to the high demand for funding. Land cost and increases in construction materials and labor contribute to higher costs per unit and the need for additional subsidy to maintain affordability.

Costs are now higher in Charlotte than before the 2008 recession. Higher land prices affect the cost of multifamily development and increase mortgage payment amounts for single family homebuyers. Most recent MLS data indicates the median sales price for single family homes in Mecklenburg County is \$320,000.

Another barrier to affordable housing is significant levels of aging housing stock in Charlotte-Mecklenburg. Older housing is often leased to low income renters at affordable rates but can be unsafe or unhealthy. Low cost housing stock is targeted by investors for rental use or redevelopment and may remove affordable rental or homeownership opportunities from the market.

Access to mortgage loans for low income buyers is another major barrier to affordable housing. One result of the 2008 finance crisis was the tightening of credit rules and increases in insurance premiums related to mortgage lending. The result is less households able to qualify for a mortgage loan at any rate.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City has adopted a progressive set of codes and ordinances that broadly allow housing throughout the City and provides voluntary incentives for the provision of a mix of housing for households with diverse income. City policies also ensure projects funded by the city are assessed for equity. The Housing Locational Scoring Tool provides data on amenities, jobs, diversity and neighborhood change to help City leaders compare sites and select developments that further City housing goals. The City is working on a new comprehensive plan. The plan is being developed through a participative process and using an equity lens. Once complete, the plan will drive development of the City for the next twenty years. It currently includes a mixture of new neighborhood types allowing for increased density and a wide array

of building types. It's the City's goals that these updates will spur diverse development throughout the City and create a diversity of housing options.

To lessen barriers to affordable housing the City supports nonprofit housing agencies, encourages creative partnerships and provides funding to support diverse housing options in the Charlotte Mecklenburg community. The City supports nonprofit organizations providing a wide range of services to increase and support housing options for low income households from housing counseling to financial assistance. The City also partners with housing developers to produce housing stock that meets the needs of households earning various levels of income. City funding often fills the financial gap in a housing development that would otherwise be overcome by high rental or purchase rates.

#### Discussion

The City has a goal of providing diverse housing options in locations close to jobs, transportation and amenities. By providing gap financing, housing rehabilitation and partnering with nonprofit housing organizations the City participates in lowering affordable housing barriers.

### AP-85 Other Actions - 91.420, 91.220(k)

#### Introduction

The delivery of housing and support services to low and very-low income families and individuals in Charlotte-Mecklenburg involves public, private and non-profit participation at the local, state and federal levels. The following section further details what services will be provided, their method of delivery and how various programs and agencies work together to create a comprehensive service strategy.

#### Actions planned to address obstacles to meeting underserved needs

Underserved needs are identified as limited housing units available for low and very low income households, limited housing for persons with special needs and lack of funding to quickly rehouse homeless individuals and households. To address these obstacles, the City will take the following actions; 1) provide gap funding for housing developments that will serve low and very low income households, 2) Seek proposals and set aside funding for housing developments that will provide housing and services for special needs populations and 3) Provide housing subsidies designed to quickly rehouse households experiencing a housing crisis such as homelessness.

#### Actions planned to foster and maintain affordable housing

Much of the City's expenditure of federal funding is devoted to a diverse housing strategy with the goal of creating and maintaining housing affordable to low- and moderate-income households. Charlotte provides multiple housing rehabilitation programs to City residents. These programs are designed to stabilize existing naturally occurring affordable single-family housing units and facilitate older residents aging in place. Charlotte also provides a multimillion dollar down payment assistance program for single family home purchase. Charlotte leverages federal investment through the City's Housing Trust Fund. The trust fund provides \$50 million in housing investment every two years and is largely used as gap financing to draw new affordable housing unit development to the City.

#### Actions planned to reduce lead-based paint hazards

The City of Charlotte received \$3,039,624.00 in federal assistance from the U.S. Department of Housing and Urban Development for the Lead-Based Paint Hazard Control Grant Program and \$595,598 from the Office of Lead Hazard Control and Healthy Homes as Healthy Homes Supplemental Funding. This funding was approved and provided through the 2012 Appropriations Act for Lead Hazard Control Program. Under the new grant, approximately 210 homes will be inspected and risk assessed for lead based paint hazards and approximately 150 homes will have hazard control activities (testing, inspections and housing rehabilitation activities to reduce lead hazards). The City will further integrate lead safe work practices to all city rehabilitation programs, provide technical assistance as requested to contractors on the Housing Bidder's Lists regarding lead safe work practices, encourage Code Enforcement officials to

make referrals to LeadSafe Charlotte and enforce code requirements regarding the elimination of deteriorated paint. Out of the 150 homes, 103 units will receive repairs to directly address health and safety concerns identified within the home funded through the Healthy Homes Supplement. The program's purpose is to perform lead testing and lead hazard control activities. The City completed a Lead Hazard Control Program in fiscal year 2016 and is currently operating a new grant awarded in fiscal year 2019.

The City will also focus on increasing collaboration with the Mecklenburg County Health Department to do outreach and testing of children in vulnerable neighborhoods, including those with an increasing number of Hispanic/Latino children. The City prioritizes units enrolled in the lead program through direct referrals from the Mecklenburg County Health Department for children with elevated levels at 10 ug/l or above.

#### Actions planned to reduce the number of poverty-level families

The City of Charlotte and Mecklenburg County have been pursuing various strategies and initiatives to improve economic opportunity for low wealth residents. Most of these efforts are integrated into the goals, programs and policies of the City of Charlotte Housing & Neighborhood Services, the Mecklenburg County Department of Social Services and Inlivian (formerly the Charlotte Housing Authority). Some of the prominent strategies aimed at reducing poverty in Charlotte-Mecklenburg include:

- Mecklenburg County's Work First Family Assistance Program provides cash assistance and Medicaid coverage to families with minor children and training through Employment & Career Services to help them become employed and move toward self-sufficiency.
- Inlivian's Family Self-Sufficiency Program that provides for opportunities to families to achieve economic independence by providing services including childcare, counseling, trainings, transportation and job training.
- Local Job-Link system that provides access to training and jobs.
- Mayor's Mentoring Alliance connects Charlotte mentoring organizations for the purpose of promoting best practices through providing workshops, resources and connects Charlotte's mentoring community.
- Mayor's Youth Employment Program that provides summer high school age youth to explore
  careers, hone skills, and gain exposure to models of professionalism, creating pathways to
  attainable career goals.

#### Actions planned to develop institutional structure

The Charlotte Mecklenburg area has a robust delivery system providing services from emergency shelter to first time homeownership. The City works with a number of local nonprofit housing agencies who provide programs and services on behalf of the City. Inlivian is responsible for all public housing developments in Charlotte Mecklenburg and is also the responsible entity for the Housing Choice

Voucher Program. The Charlotte Mecklenburg Housing Partnership is a Community Development Business Organization that works closely with the City on several projects. The City will continue to rely on these partnerships to implement HUD funded housing and community development programs. The City participates in various advisory boards and coalitions, including the Charlotte-Mecklenburg Continuum of Care Board, that provide continuous feedback on the City's delivery systems and offer suggestions on how to better streamline program delivery and project implementation.

# Actions planned to enhance coordination between public and private housing and social service agencies

The City fosters coordination through its participation Charlotte Mecklenburg Continuum of Care Board which recommends housing best practices and foster coordination between the public and private sectors. The City and many local nonprofit organizations serving homeless individuals work through the Homeless Services Network to coordinate service delivery for families with critical needs related to homelessness.

#### Discussion

The City of Charlotte will continue to work with its partners to improve delivery structures and services for City residents. Ongoing evaluation of performance and citizen engagement produce high quality programs and strong partnerships that better service the needs of low and moderate household members.

# **Program Specific Requirements**

# AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

City of Charlotte participates in the Community Development Block Grant (CDBG), HOME Partnership (HOME), Emergency Solutions Grant (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) programs. The following section covers information and requirements that are program or grant specific.

# Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

<ol> <li>The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed</li> <li>The amount of proceeds from section 108 loan guarantees that will be used during the year to</li> </ol>	0
address the priority needs and specific objectives identified in the grantee's strategic plan.	0
<ul><li>3. The amount of surplus funds from urban renewal settlements</li><li>4. The amount of any grant funds returned to the line of credit for which the planned use has not</li></ul>	0
been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0
Other CDBG Requirements	
Other CDBG Requirements  1. The amount of urgent need activities	0
	0

# HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City will be using its HOME funds to provide homebuyer downpayment assistance, constuct new housing units for low and moderate income families, rehabilitate exisiting housing units and provide tenant based rental assistance.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Charlotte will use HUD recapture provisions as provided in 92.254. All CHDOs, subrecipients, and consortium members who administer HOME programs will follow resale/recapture provisions that have been adopted by the City.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Generally, to maintain eligiblity for HOME assistance, units must be occupied by a low or moderate income family and continue to meet HOME requirements during the entire period of affordability based on the amount of assistance and as indicated below:

HOME Funds Period of Affordability/Term of the Loan Less than \$15,000 / 5 years \$15,000 - \$40,000 / 10 years More than \$40,000 / 15 years New Construction / 20 years

Longer affordability periods may be required of multifamily developers based on various development factors.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City has no plans to refinance existing multifamily housing debt.

**Emergency Solutions Grant (ESG)** 

Annual Action Plan 2021

- Include written standards for providing ESG assistance (may include as attachment)
   This is provided as an attachment.
- 2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
  - Charlotte-Mecklenburg operates a Coordinated Assessment (CA) system that aims to connect homeless individuals and families, or those at risk of homelessness, to an existing available shelter/housing resource in our community. Utilizing CA, households experiencing homelessness (or at risk of homelessness) know exactly where to go to get help; are assessed in a standard and consistent way; are matched with the housing/services that best meet their needs, as available. By assessing everyone the same way, the community can be strategic about its limited resources and where resources may need to be redirected or added.
- 3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).
  - The City of Charlotte conducts a request for proposals to allocate ESG funding. Funding is allocated to high performing agencies that exhibit the capacity to provide quality services in a cost effective manner. The City's ESG funding priorities are Rapid Re-Housing, Emergency Shelter, Prevention Services, Street Outreach and HMIS. Funding allocations are made on the basis of priority of the proposed service(s), agency capacity, leverage and the availability of funding.
- 4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.
  - The City of Charlotte meets the homeless participation requirements by having a currently homeless or formerly homeless seat on our CoC governing board. In addition, a currently homeless or formerly homeless individual participate on review committees for ESG and COC funding.
- 5. Describe performance standards for evaluating ESG.
  - All ESG sub-recipients enter into contractual agreements with the City of Charlotte, which includes a detailed scope of services with measurable objectives. The federal general provisions, along with the appropriate OMB Circulars, are included in contractual agreements to ensure compliance. The budget line items must be reflective of the goals and objectives. Prior to program start-up, the City monitors and evaluates the sub-recipients programmatic and fiscal management practices. Sub-recipients are required to provide periodic reports on their achievement of contractual

objectives. These contracts are monitored on an annual basis. Staff conducts annual site visits to ensure performance of program activities (programmatic as well as fiscal control.) In addition, the Financial Services Unit reviews each request for payment. The program monitors determine whether the sub-recipient's program is on target and in compliance. A final evaluation is performed at the end of the contract period.